



The Independent Insurance Agents of Maryland, Inc.

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Shelley M. Arnold, CPCU, AU, ARM, AAI, ACSR, Executive Vice President

Joshua M. Sharfstein, M.D.

Re: Exchange Board: Public Comment Advisory Committees

November 22, 2011

Dear Dr. Sharfstein,

I am writing to you on behalf of the Independent Insurance Agents of Maryland, Inc. ("IIAM") to provide comments on the reports of the Advisory Committees and consultants to the Maryland Health Benefit Exchange Board ("Board"). IIAM is a State trade association representing over 200 independent agencies/small businesses in the State of Maryland. We appreciate this opportunity to provide comments.

We commend the Exchange Board on the overall process related to the Advisory Committees over the past several months. It has been an open and thoughtful process throughout.

Overall, we would like to express our desire to see the scope of the Exchange limited to its statutorily prescribed purpose of reducing the number of uninsured individuals in Maryland. We would like the Exchange to fulfill that goal without disrupting the private market. There are a number of services that independent producers provide in order to fill its client's varying needs. The Exchange should not supplant the role of the insurance producer, nor should it compete for business in the private market.

We would also like to address the Navigator Program in the Exchange. The role of the Navigator was and is a difficult challenge for policymakers to deal with. The role of the insurance producer is clearly delineated under Maryland law. It is regulated by the Insurance Commissioner who sets standards by which licensed producers must meet in order to operate in Maryland.

We urge that a Navigator should not be allowed to sell, solicit, or negotiate insurance contracts without first obtaining an insurance producers license. It is important that the persons carrying out such important functions be held to the high standard required under Maryland law in order to protect the citizens of the State. To that end, we think that the Maryland Insurance Commissioner is the appropriate regulator for Navigators given her current role with respect to insurance producers.

Sincerely,

Shelley Arnold, CPCU, AU, ARM, AAI
President



Proudly Serving Independent Insurance Agents in Maryland for over 100 Years!

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